

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

CYRANO, INC.,

Plaintiff,

v.

QUOTIUM TECHNOLOGIES, INC.,

QUOTIUM TECHNOLOGIES, S.A.,

and

TECHNOLOGIES, S.A.,

Defendants.

CIVIL ACTION NO. 05-CV-11558-DPW

**QUOTIUM'S ASSENTED-TO MOTION FOR LEAVE OF
COURT TO FILE MEMORANDUM IN EXCESS OF TWENTY PAGES**

Pursuant to Rule 7.1(B)(4) Local Rule of United States District Court for the District of Massachusetts, Defendants Technologies, S.A., Quotium Technologies, S.A. and Quotium Technologies, Inc. ("Quotium") hereby respectfully move this Court for leave to file a memorandum of law in support of its motion to dismiss in excess of the twenty (20) page limit prescribed by Rule 7.1(B)(4). As grounds for this request, Quotium states as follows:

1. Plaintiff Cyrano, Inc. ("CI") assents to the relief requested herein.
2. The allegations in the Complaint involve complicated past and pending proceedings in a related action in the U.S. District Court for the District of Massachusetts before Judge Tauro.
3. Quotium has moved to dismiss the Complaint primarily because it is duplicative of allegations and claims previously adjudicated by Judge Tauro in that related action.
4. Quotium requires the relief requested in order to sufficiently address these past proceedings and compare CI's allegations in the related action to its allegations here. In addition, Quotium has moved to dismiss all nine counts of the Complaint, several of which raise

different issues and thus must be addressed separately. Finally, in light of the pending related action before Judge Tauro, as well as CI's appeal of that case, Quotium has made a request in the alternative for a stay.

5. For all of the foregoing reasons, allowance of this motion will aid this Court in its adjudication of Quotium's motion to dismiss, and is in the interests of judicial economy and justice. Allowance of this motion also will not prejudice CI, which has assented to Quotium's request to file its brief in excess of 20 pages.

WHEREFORE, Quotium respectfully requests that the Court grant it leave of court to exceed the twenty-page limit.

DATED: September 23, 2005

Respectfully submitted,

/s/ Mayeti Gametchu
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Mayeti Gametchu (BBO# 647787)
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Counsel For Defendants

TECHNOLOGIES, S.A.,
QUOTIUM TECHNOLOGIES, S.A., and
QUOTIUM TECHNOLOGIES, INC.

Local Rule 7.1 Certificate Of Compliance

I, Mayeti Gametchu, hereby certify that on September 23, 2005, I conferred by telephone with Michael Sugrue, counsel of record for Plaintiff Cyrano, Inc., in a good faith attempt to resolve or narrow the issues, and he assented to the relief requested herein.

/s/ Mayeti Gametchu

Certificate of Service

I, Mayeti Gametchu, hereby certify that on September 23, 2005, I served a copy of the foregoing motion by overnight mail to be delivered next business day, post pre-paid, on counsel of record for Cyrano, Inc., Stephen Y. Chow and Michael Sugrue, Perkins, Smith & Cohen, 1 Beacon St., 30th Floor, Boston, MA 02108-3106.

/s/ Mayeti Gametchu

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